

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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SECURITIES AND EXCHANGE )  
COMMISSION, )  
                            )  
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Plaintiffs, )  
v.                         )          No. 05-10247-NMG  
                            )  
                            )

JAMES TAMBONE and ROBERT HUSSEY, )  
                            )  
                            )

Defendants. )  
                            )  
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**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5.3 of the United States District Court for the District of Massachusetts, Defendant Robert Hussey hereby moves this Court to grant Michelle E. Williams leave to appear and practice in this Court *pro hac vice*. As grounds for this motion, Defendant Robert Hussey states as follows:

1. Frank A. Libby, Jr., a partner at Kelly, Libby & Hoopes, P.C., is a member in good standing of the Bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and of the Bar of the United States District Court for the District of Massachusetts. Mr. Libby has filed an appearance in this action.
2. Michelle E. Williams is an attorney with the law firm of Clifford Chance US LLP, 31 West 52<sup>nd</sup> Street, New York, New York 10019.
3. Michelle E. Williams is not a member of the Massachusetts Bar or the Bar of the United States District Court for the District of Massachusetts.

4. Michelle E. Williams has met the requirements to practice in the United States District Court for the District of Massachusetts, as set forth in L.R. 83.5.3. *See* Certificate of Good Standing issued by the United State District Court for the Southern District of New York for Michelle E. Williams (attached hereto as Exhibit A).

WHEREFORE, Defendant Robert Hussey respectfully requests that this Court grant this motion to admit Michelle E. Williams *pro hac vice*.

Respectfully submitted,

Defendant Robert Hussey

By his attorneys,

/s/ Frank A. Libby

Frank A. Libby, Jr. (BBO # 299100)  
Kelly, Libby & Hoopes  
175 Federal Street  
Boston, MA 02110  
(617) 338-9300  
(617) 338-9911 (fax)

Dated: July 19, 2005

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

I, Frank A. Libby, hereby certify pursuant to Local Rule 7.1(a)(2) that I have conferred with counsel for plaintiff Securities and Exchange Commission and that plaintiff does not oppose this motion.

/s/ Frank A. Libby

United States District Court  
Southern District of New York

**Certificate of  
Good Standing**

I, J. Michael McMahon, Clerk of this Court, certify that

MICHELLE ELIZABETH WILLIAMS, Bar # ---

was duly admitted to practice in this Court on

JULY 5<sup>th</sup>, 2005, and is in good standing

as a member of the Bar of this Court.

Dated at 500 Pearl Street  
New York, New York

on JULY 5<sup>th</sup>, 2005

*J. Michael McMahon*  
Clerk

by: *J. Michael McMahon*  
Deputy Clerk

CERTIFICATE OF MICHELLE E. WILLIAMS

I, Michelle E. Williams, hereby certify as follows:

1. I am an attorney at the law firm of Clifford Chance US LLP, which is located at 31 West 52<sup>nd</sup> Street, New York, NY 10019.
2. I have been admitted to practice in the following jurisdictions: State of New York and United States District Court for the Southern District of New York.
3. I am an attorney in good standing in all of the above jurisdictions.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the penalties of perjury, this 19th day of July, 2005.

/s/ Michelle E. Williams  
Michelle E. Williams